

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24-cv-06563-LJL

**ERRATA TO PLAINTIFFS' REPLY IN SUPPORT OF MOTION FOR CIVIL  
CONTEMPT AND TO IMPOSE SANCTIONS (ECF NO. 169)**

Plaintiffs Ruby Freeman and Wandrea' Moss respectfully submit this errata to correct an error on page 6 of Plaintiffs' reply in support of their motion to hold Defendant in civil contempt and to impose sanctions, ECF No. 169. In their reply, Plaintiffs' represented that Mr. Giuliani produced his 19 "exhibits" to Plaintiffs on December 2, 2024. *Id.* at 6. Mr. Giuliani actually made this production on December 8, 2024 by an email from his counsel that Plaintiffs have attached hereto (without the production appended). *See* Ex. A; *see also* ECF No. 117.

Dated: December 30, 2024  
New York, New York

s/ Aaron E. Nathan

WILLKIE FARR & GALLAGHER LLP  
Michael J. Gottlieb  
Meryl C. Governski (admitted *pro hac vice*)  
1875 K Street NW  
Washington, DC 20006  
(202) 303-1000  
mgottlieb@willkie.com  
mgovernski@willkie.com

Aaron E. Nathan  
M. Annie Houghton-Larsen  
787 Seventh Avenue  
New York, NY 10019  
(212) 728-8000  
anathan@willkie.com  
mhoughton-larsen@willkie.com